

# **EXHIBIT B**

**Notice of Proposed Settlement in  
*M.C. v. Jefferson County, New York, 6:22-cv-190 (N.D.N.Y.)***

**IF YOU ARE PRESCRIBED MEDICATION FOR OPIOID USE DISORDER, PLEASE READ THIS  
NOTICE OF A PROPOSED SETTLEMENT ABOUT YOUR RIGHT TO CONTINUE TREATMENT IF  
YOU ARE DETAINED AT THE JEFFERSON COUNTY CORRECTIONAL FACILITY**

A proposed settlement has been reached in a class-action lawsuit about access to medication for opioid use disorder (“MOUD,” sometimes known as medication-assisted treatment or “MAT”), such as methadone and buprenorphine, at the Jefferson County Correctional Facility. The proposed settlement aims to benefit class members significantly. A court must now decide whether to approve the settlement.

The proposed settlement requires Jefferson County to make treatment with MOUD available to people with opioid use disorder (“OUD”) incarcerated at the jail. Under the proposed settlement, people with OUD can request to start or continue MOUD treatment when they enter the jail or at any time during their detention. If approved, the proposed settlement will also end the lawsuit and resolve the claims of class members about access to MOUD at the Jefferson County Correctional Facility.

This is just a summary of the proposed settlement. A copy of the proposed settlement and other information is available at [www.nyclu.org/MClitigation](http://www.nyclu.org/MClitigation).

**IF YOU WISH TO OBJECT TO THE FAIRNESS OF THE PROPOSED SETTLEMENT, YOU MUST  
SUBMIT YOUR OBJECTION TO THE COURT BY TRANSMISSION METHOD**

**Answers to Frequently Asked Questions**

**Who is impacted by the proposed settlement?**

The proposed settlement covers all class members in the *M.C. v. Jefferson County* lawsuit. The class includes all non-pregnant individuals who are or will be detained at the Jefferson County Correctional Facility and had or will have prescriptions for agonist medication for opioid use disorder (such as methadone or any form of buprenorphine, including Suboxone and Sublocade) at the time of entry into the county’s custody.

**What do I need to do to join the class?**

Nothing. If you meet the class definition, you are automatically in the class. You do not need to take further action unless you wish to object to the proposed settlement.

**Am I entitled to money damages under the proposed settlement?**

No. This lawsuit does not involve any claim for money damages. The case and settlement will not affect an individual’s ability to bring an individual case for money damages.

**If I am *not* in the class, can I still seek treatment for OUD at the jail?**

Yes. Anyone with OUD detained at the jail can request to be assessed for MOUD treatment. State law now requires jails, including the Jefferson County Correctional Facility, to make MOUD available to treat people with OUD.

**Does the proposed settlement apply to jails others than the Jefferson County Correctional Facility?**

No, but state law now requires jails throughout New York State to make MOUD treatment available.